

To: LEE, LILY[LEE.LILY@EPA.GOV]
From: Terry, Robert
Sent: Fri 5/13/2016 4:48:32 PM
Subject: RE: Do any of these attached contain documentation re original release criteria or of Ra-226 or Th-232 background levels?

Thanks for the CD with Steve Dean's correspondence. Following is a response to an earlier inquiry that you had sent, based on some of Steve's documents that you had attached to an email.

I thought I had also sent you an email regarding another of the documents that you had attached to that same email, describing a document I had found that was dated in 2002, in which it did not appear that either Region 9 or the Navy had come to any specific conclusions about a cleanup goal for Ra-226. Unfortunately, I can't find that email.

During the next two weeks, our group will be working at home, though I do plan to be in the office for an hour or so on Wednesday morning, May 18th. I will dedicate the next two weeks almost entirely to reviewing the CD and other documents that you recently sent to me. I will probably email you more than once during the next two weeks, to keep you up to date and see if we need to modify or clarify your information requests. If you need a final transmittal from me of my findings before June 1st please let me know.

From: Terry, Robert
Sent: Monday, May 02, 2016 2:22 PM
To: LEE, LILY <LEE.LILY@EPA.GOV>
Subject: RE: Do any of these attached contain documentation re original release criteria or of Ra-226 or Th-232 background levels?

The release criteria in Table 6-1 of the Basewide Radiological Work Plan dated February 16, 2005, does state that the concentration limit for ²²⁶Ra in soil (both Outdoor Worker and Residentail scenarios) ". . . is 1 pCi/g above background; not to exceed 2 pCi/g total, per agreement with EPA." So there might be some document dated prior to February 116, 2005, where EPA and the Navy agreed on a cleanup goal of 1 pCi/g above background.

The document also illustrates that the Navy did not yet clearly understand that the 25 mrem/yr NRC decommissioning rule does not apply to Superfund site cleanups, even though Steve Dean had already made that clear in earlier correspondence.

From: LEE, LILY

Sent: Wednesday, April 27, 2016 8:57 AM

To: Terry, Robert <Terry.Robert@epa.gov>

Cc: Chesnutt, John <Chesnutt.John@epa.gov>

Subject: Do any of these attached contain documentation re original release criteria or of Ra-226 or Th-232 background levels?

Dear Rob,

Dan Hirsch asked the following:

1. Documentation re original release criteria & calculations using the then-current version of EPA PRG Calculator, including what risk level that represents
2. “The Hunters Point documents we have been reviewing indicate a remediation level for radium-226 of 1 pCi/g above background, not to exceed 2 pCi/g, “per agreement with EPA.”
Could you send me documentation of that EPA agreement and its basis, and any risk assessment that was performed at the time of the risk associated with that level of radium? Also, I am having trouble locating the value being employed for radium background—could you let me know what value is being used and where I can find the source for it?”

We are interested in Thorium background levels.

Mark Ripperda thought these documents might contain information relevant to these questions. Could you please review these documents to see if they have information that addresses these questions? I'd appreciate it!

- Lily

Lily Lee

Cleanup Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St. (SFD-8-3)
San Francisco, CA 94105
Tel: 415-947-4187, Fax: 415-947-3518
www.epa.gov/region9/superfund

From: ELATTAR, SARA
Sent: Thursday, April 21, 2016 8:42 AM
To: LEE, LILY <LEE.LILY@EPA.GOV>
Cc: HSG Circulation <circulation@herndon-group.com>
Subject: RE: Could I get these documents?

Good morning Lily,

No problem at all, I am glad to help out.

I have created DRF (Document Request form) on your behalf. Please see below:

| | Requester | Doc Request # | Site Name | Submitted | Due Date | Status | Released | Request Type |
|---|-----------|---------------|---|------------|------------|------------|----------|---------------|
| Notes Link | LEE, L. | 90421-0820 | TREASURE ISLAND NAVAL STN HUNTERS PT AN | 04/21/2016 | 04/27/2016 | In Process | No | (Not Entered) |

As for the requested documents, 9 documents were found in PDF formate in SEMS. I will attach them within this email. Please see attachment.

The rest of the documents (2054332, 88184149, 2099768, 156344, 2054389, 2054392, 2089669, and 2089668) are located at the FRC and I have requested for their retrieval. Please note it can take from 3 to 4 days to arrive to the Records center,

You will be notified immediately of their arrival.

Please feel free to request as many documents as necessary! ☺

Let me know if you need additional assistance.

Best,

Sara Elattar

Document Specialist

U.S. EPA R9 Regional Records Center

(415) 947-8717

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From: LEE, LILY

Sent: Wednesday, April 20, 2016 9:35 PM

To: ELATTAR, SARA <Elattar.Sara@epa.gov>

Subject: Could I get these documents?

Dear Sara

I'm so sorry to ask for so many this time. Could I please get these? I appreciate it!

- Lily

Lily Lee

Cleanup Project Manager

Superfund Division

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75 Hawthorne St. (SFD-8-3)

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From: Ripperda, Mark

Sent: Wednesday, April 20, 2016 11:38 AM

To: LEE, LILY <LEE.LILY@EPA.GOV>

Subject: RE: Got 2 of these 2153266, 2229254, and 2232762

The missing cleanup goal information is between the 2001 Action Memo which sets a cleanup goal of 5pCi/g above background and the 2006 Action Memo which sets 1 pCi/g above background, per communication with EPA. So here's a list of what I see that might contain it (I'm guessing that the last three in the list have the best chance of documenting the agreement):

| | | | |
|----------|------------|---|---|
| 2054332 | 4/12/2001 | Memo: Comments on radiological investigation & confirmation surveys conducted on 3/19/01, w/attchs (radiation) | Steve Dean / Environmental Protection Agency - Region 9 |
| 88184149 | 4/12/2001 | Memo: Bldg 364 radiological contamination removal actions (radiation) | Steve Dean / Environmental Protection Agency - Region 9 |
| 2099768 | 6/6/2002 | Ltr: Comments on Historical radiological assessment, v2 - use of general radioactive materials, 1939-2002 (3/29/02), w/TL to K Forman fr C Trombadore 6/6/02 | Environmental Protection Agency - Region 9 |
| 156344 | 3/28/2003 | Radiological scanner van survey (9/9/02-9/12/02), w/TL (radiation) | Environmental Protection Agency - Radiation & Indoor Environments National Laboratory |
| 2126455 | 5/19/2003 | EPA responses to comments on draft historical radiological assessment, v 2, w/TL fr C Trombadore to K Forman | Environmental Protection Agency - Region 9 |
| 2226304 | 4/27/2004 | Ltr: Transmits comments fr EPA & EPA contractor on draft final historical radiological assessment, v2, dated 2/04, w/attchs | Michael Work / Environmental Protection Agency - Region 9 |
| 2227348 | 11/16/2004 | Comments on final historical radiological assessment & comments on response to comments on draft final historical radiological assessment, history of use of general radioactive materials (1939-2003) w/TL fr M Work to K Forman | Environmental Protection Agency - Region 9 |
| 2216003 | 2/16/2005 | Basewide radiological workplan, w/apps A-B & w/o fig 2-1 | Tetra Tech F W, Inc M K M Engineers, Inc New World Environmental, Inc |

| | | | | |
|---------|-----------|---|---|--|
| 2054389 | | Workplan, removal action design & implementation, metal debris reef & metal slag areas, parcels E & E-2, draft, w/TLS, instruction sheet, & replacement pages (radiation) | Tetra Tech F W, Inc | |
| | 2/18/2005 | | | |
| 2140350 | 2/22/2005 | Mtg Agenda & Notes: BRAC Cleanup Team (BCT) mtg, w/attchs Project workplan, PCB hot spot soil excavation site, parcels E & E-2, draft, w/TL fr K Forman to M Work (radiation) | Tetra Tech, Inc | |
| 2054392 | 2/25/2005 | | Tetra Tech F W, Inc | |
| 2232765 | 3/7/2005 | Email: Questions about basewide radiological workplan, w/history | Michael Work / Environmental Protection Agency - Region 9 | Steve Dean / Environmental Protection Agency Region 9 |
| 2232718 | 4/6/2005 | Mtg Handout: Radiological program overview mtg (4/6/05), w/marginalia | US Navy - Base Realignment & Closure Program Management Office | |
| 2226257 | 4/13/2005 | Ltr: Concerns re project workplan, radiological time-critical removal action, IR-02 northwest & central, parcel E, dated 3/9/05, w/TL fr I Balkissoon to J Ricks | James Ricks / Environmental Protection Agency - Region 9 | |
| 2232748 | 4/14/2005 | Ltr: Comments on draft removal action design & implementation workplan, metal debris reef & metal slag areas, parcels E & E-2, dated 2/05, w/TL fr J Ricks to P Brooks | Environmental Protection Agency - Region 9 | |
| 2089669 | 2/14/2006 | Draft final project workplan, base-wide storm drain & sanitary sewer removal, w/TL to J Ricks fr K Forman 2/13/06 | Tetra Tech E C, Inc | |
| 2089668 | 2/14/2006 | Draft final parcel B design plan, storm drain & sanitary sewer removal, w/TL to J Ricks fr K Forman 2/13/06 | Tetra Tech E C, Inc | |